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16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**

18 JONATHAN DEAN IVAN MUÑOZ,) Case No.: 1:23-cv-00385-BAM
19 Plaintiff,)
20) STIPULATION AND ~~PROPOSED~~ ORDER
21) FOR AN EXTENSION OF TIME
22)
23 vs.)
24 KILOLO KIJAKAZI,)
25 Acting Commissioner of Social Security,)
26)
27 Defendant.)
28

29 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
30 parties, through their respective counsel of record, that the time for Defendant to respond to
31 Plaintiff's Complaint be extended from May 14, 2023, up to and including June 13, 2023. This
32 is the Defendant's first request for an extension. Defendant requests this extension because
33 Defendant has been notified that a certified administrative transcript (CAR) is not yet available
34 in this case. Defendant therefore cannot respond to Plaintiff's Complaint. Once the CAR arrives,
35 Defendant will need to review it for defects before submitting it. For these reasons, Defendant
36

1 asks the Court to approve this unopposed motion and extend the deadline to file a response to
2 Plaintiff's Complaint. Plaintiff does not oppose Defendant's request for an extension of time.
3 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
4
5

6 Respectfully submitted,
7

8 Dated: May 4, 2023

9 /s/ Francesco Paulo Benavides*

10 (*as authorized via e-mail on May 1, 2023)
11 Jonathan Omar Pena
12 Attorney for Plaintiff

13 Dated: May 4, 2023

14 PHILLIP A. TALBERT
15 United States Attorney
16 MATHEW W. PILE
17 Associate General Counsel
18 Social Security Administration

19 By: /s/ Heidi L. Triesch

20 Heidi L. Triesch
21 Special Assistant U.S. Attorney
22 Attorneys for Defendant

23 **ORDER**

24 Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY
25 ORDERED that Defendant shall have an extension, up to and including June 13, 2023, to
26 respond to Plaintiff's Complaint.
27
28 IT IS SO ORDERED.

29 Dated: May 8, 2023

30 /s/ Barbara A. McAuliffe

31 UNITED STATES MAGISTRATE JUDGE